

# EXHIBIT 4

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Attorneys for Plaintiffs,  
 TARA ANN BARTOLI, et al.

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

TARA ANN BARTOLI, et al.,	)	Case No. 5:18-cv-02643-MWF(KKx)
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
RANCHO CALIFORNIA RV	)	<b>PLAINTIFFS' INITIAL</b>
RESORT OWNERS ASSOCIATION,	)	<b>DISCLOSURES (FRCP 26(a)(1))</b>
a California nonprofit mutual benefit	)	
corporation; DESERT RESORT	)	Complaint Filed: December 20, 2018
MANAGEMENT, INC., a California	)	
corporation; CARI BURLEIGH, an	)	
individual; CANDICE ELAINE	)	
WILLIAMS, an individual doing	)	
business as FAIRWAY ASSOCIATES;	)	
KIMBERLY LYNN BACA, an	)	
individual doing business as	)	
FAIRWAY ASSOCIATES; and, DOES	)	
1 through 10, inclusive,	)	
	)	
Defendants.	)	
	)	

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PLAINTIFFS Tara Bartoli, Brett Bartoli, and Tara Bartoli as Guardian ad litem for M.B. and L.B., hereby make their initial disclosures pursuant to FRCP 26(a)(1) as follows:

**1. DOCUMENTS THAT MAY BE USED TO SUPPORT PLAINTIFFS' CLAIMS.**

See attached documents. Plaintiffs may also use the content and copy from Defendants' respective websites, internal communications between Defendants and/or their employees and/or representatives, lease agreements and other documents maintained by Defendants, including but not limited to documents evidencing rules and regulations of the Resort, property listings, responses to rental/purchase inquiries of third parties, as well as the Resort's CC&Rs and documents maintained by the County of Riverside and/or other public entities regarding permitting for the Resort. Plaintiffs are informed and believe that all such documents are maintained by either Defendants and/or the County of Riverside.

**2. DAMAGES**

Plaintiffs have computed their damages based on information currently available, as follows:

**Special Damages**

Lost Income: \$1,652.75 per month, beginning May 1, 2019

Moving Expenses: \$4,223.78

RV Storage: \$100.00 per month, beginning May 1, 2019

Difference in Rent: \$1,100.00 per month, beginning May 1, 2019

**General Damages**

Emotional Distress: Unknown at this time

Lost Housing Opportunity: Unknown at this time

Loss of Rights: Unknown at this time

Punitive Damages: Unknown at this time

1 **3. WITNESSES**

2 At the present time, Plaintiffs believe that the following individuals are  
3 likely to have discoverable information that our clients may use to support their  
4 claims:\

5 (A) Plaintiffs (may be contacted through counsel);

6 (B) Candice Burleigh

- 7 - Percipient testimony regarding Resort rules and regulations,  
8 relationships of Defendants, communications with Plaintiffs, and  
9 rental/sale history of Resort as well as demographics of Resort  
10 residents

11 (C) Candice Williams

- 12 - Percipient testimony regarding Resort rules and regulations,  
13 relationships of Defendants, communications with Plaintiffs, and  
14 rental/sale history of Resort as well as demographics of Resort  
15 residents

16 (D) Kimberly Baca

- 17 - Percipient testimony regarding Resort rules and regulations,  
18 relationships of Defendants, communications with Plaintiffs, and  
19 rental/sale history of Resort as well as demographics of Resort  
20 residents

21 (E) Person Most Knowledgeable for Rancho California RV Resort  
22 Owners Association

- 23 - Percipient testimony regarding Resort rules and regulations,  
24 relationships of Defendants, communications with Plaintiffs, and  
25 rental/sale history of Resort as well as demographics of Resort  
26 residents

27 (F) Person Most Knowledgeable for Desert Resort Management  
28



- Percipient testimony regarding Resort rules and regulations, relationships of Defendants, communications with Plaintiffs, and rental/sale history of Resort as well as demographics of Resort residents

(G) Betty Beynon, 27962 Via Arica, Laguna Niguel, CA 92677, (949) 874-5232

- Percipient testimony regarding the distress suffered by Plaintiffs as a result of the acts of Defendants

(H) Michael Beynon, 26875 Calle Hermosa, Capistrano Beach, CA 92624, (949) 374-0030

- Percipient testimony regarding the distress suffered by Plaintiffs as a result of the acts of Defendants

(I) Eddie Mulhall, address presently unknown, (949) 742-0016;

- Percipient testimony regarding the distress suffered by Plaintiffs as a result of the acts of Defendants

(J) Josh Pizzarusso, 10 Calle Liberation, Rancho Santa Margarita, CA 92688, (949) 636-4149

- Percipient testimony regarding the distress suffered by Plaintiffs as a result of the acts of Defendants

(K) Hope Pizzarusso, 10 Calle Liberation, Rancho Santa Margarita, CA 92688, (949) 636-4149

- Percipient testimony regarding the distress suffered by Plaintiffs as a result of the acts of Defendants

(L) Melissa Cuneo Redden, address and telephone number presently unknown

- Percipient testimony regarding the operation and management of the Resort, Fairways and/or DRM, including but not limited to

1 Resort rules and regulations and enforcement thereof and  
2 demographic information about Resort residents

3 (M) Person Most Knowledgeable, Sky Mountain Charter School, 8560  
4 Aliento Road, Lucerne Valley, CA 92356, (800) 979-4436

5 - Percipient testimony regarding M.B.'s enrollment in a public  
6 charter homeschooling program

7 (N) Person Most Knowledgeable, County of Riverside, contact  
8 information unknown at this time

9 - Percipient testimony regarding the permitting history of the Resort  
10 and all condition(s) imposed upon issuance of any permits.

11 Pursuant to FRCP 26(e), Plaintiffs reserve the right to supplement or correct  
12 this disclosure should Plaintiffs learn that the information provided herein is  
13 incomplete or incorrect, and if the additional or corrective information has not  
14 otherwise been made known to your clients during the discovery process or in  
15 writing.

16  
17 DAPEER, ROSENBLIT & LITVAK, LLP

18  
19 Dated: June 4, 2019

20 By: 

21 Eric P. Markus  
22 Attorneys for Plaintiffs,  
23 Tara Bartoli, et al.  
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